

EXHIBIT 19
TO OPPOSITION TO MOTION TO COMPEL

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November 22, 2006

34717.00007

VIA FACSIMILE

Joseph D. Gray, Esq.
Vinson & Elkins, LLP
2801 Via Fortuna, Ste. 100
Austin, Texas 78746

Re: *AdvanceMe, Inc. v. RapidPay, LLC, et al.*
AdvanceMe, Inc. v. AmeriMerchant, LLC

Dear Mr. Gray:

This is in response to your letter of November 20, 2006 regarding the 30(b)(6) deposition of AdvanceMe.

Rather than continuing to meet and confer in good faith, the Defendants made the decision to rush into Court and file a motion to compel on the scope of the 30(b)(6) deposition. Since the parties are in disagreement on the proper scope of the deposition, and AdvanceMe is unwilling to produce the same witness twice for the same deposition, it makes no sense to schedule the deposition at this time. Once we receive the Court's order on the Defendants' motion, we will contact you in order to schedule the deposition.

In this regard, we note that the Defendants will not be permitted to ask any questions which seek information on topics that have been precluded by Court order. In other words, if the Court agrees with our position, then the Defendants will not be permitted to ask any questions concerning topics 4-6, 8-15, and 22. If, on the other hand, the Court agrees with the Defendants' position and permits questioning on those topics to proceed, then of course AdvanceMe will abide by the Court's decision.

Lastly, your new assertion that the Defendants are entitled to 14 hours to conduct a single 30(b)(6) deposition raises serious questions about the manner in which the Defendants intend to conduct the deposition. There is no reason why the Defendants (who are all represented by the same attorneys) need longer than seven hours to complete this deposition. Accordingly, we intend to make a 30(b)(6) witness available for a single session of seven hours. If the Defendants are seriously insisting that AdvanceMe reserve

Paul Hastings

Joseph D. Gray, Esq.
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more than seven hours for the deposition, please confirm this in writing immediately so AdvanceMe can determine whether to seek a motion for protective order.

Sincerely,



Michael N. Edelman
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

MNE:rjs

cc: William G. Schuurman, Esq. *(via facsimile)*
Hilary L. Preston, Esq. *(via facsimile)*
Douglas R. McSwane, Jr., Esq. *(via facsimile)*

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Joseph D. Gray	Vinson & Elkins LLP	512.542.8612	512.542.8400
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Hilary L. Preston	Vinson & Elkins LLP	212.237.0100	212.237.0000
Willem J. Schuurman	Vinson & Elkins LLP	512.542.8612	512.542.8400
Douglas R. McSwane	Potter Minton	903.597-8311	903.593.0846

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